

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**SHARON PAIGE**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 3:21-cv-618-CWR-FKB**

**MISSISSIPPI DEPARTMENT OF MENTAL HEALTH;  
HUDSPETH REGIONAL CENTER (BOSWELL);  
DIRECTOR JERRIE BARNES; and  
DIRECTOR KEESHA LOWE NASH**

**DEFENDANTS**

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**UNOPPOSED MOTION FOR EXTENSION OF DISCOVERY  
DEADLINE AND DISPOSITIVE MOTION DEADLINE**

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Come now, Defendants Mississippi Department of Mental Health, Hudspeth Regional Center (Boswell), Director Jerrie Barnes and Director Keesha Lowe Nash (“Defendants”), by and through undersigned counsel, and request that the Court extend the discovery deadline and the dispositive motion deadline, as follows:

1. Based on the CMO in this case, the discovery deadline was May 2, 2023 and the dispositive motion deadline was May 16, 2023 [Dkt.14]. Defendants filed an unopposed motion for extension of those deadlines on April 25, 2023 [Dkt. 19] and the Court extended the discovery deadline to June 2, 2023 and the dispositive motion deadline to June 16, 2023 [Text-Only Order 04.26.23].

2. Based on a change of counsel for Defendants, as well as a delay in receiving the transcript of the deposition of Plaintiff Sharon Paige taken on May 23, 2023, the undersigned needs time to review the transcript, and prepare a dispositive motion in this matter on behalf of the Defendants.

3. Further, during Plaintiff's deposition on May 23, 2023, Plaintiff was asked to sign a number of authorization forms, including forms allowing Defendants to obtain medical and employment records. Plaintiff agreed to return these to the undersigned counsel within a week. To date, however, and despite a reminder, Plaintiff has yet to return said authorizations. Accordingly, Defendants have requested a discovery conference with Judge Ball and accordingly, will need additional time to complete discovery.

4. Defendants hereby request that the discovery deadline be extended by four weeks, until June 30, 2023, and the dispositive motion deadline be extended to July 14, 2023.

5. Plaintiff Sharon Paige does not oppose this request to extend these deadlines.

6. This motion is not for purposes of delay and will not prejudice the Plaintiff. Further, these extensions to these two deadlines should not affect other deadlines, including a trial setting during the December 4, 2023 trial term, but if so, Defendants request a new trial setting.

Respectfully submitted this the 13<sup>th</sup> day of June, 2023.

MISSISSIPPI DEPARTMENT OF MENTAL  
HEALTH; HUDSPETH REGIONAL  
CENTER (BOSWELL); DIRECTOR JERRIE  
BARNES; AND DIRECTOR KEESHA  
LOWE NASH, *Defendants*

LYNN FITCH, ATTORNEY GENERAL  
STATE OF MISSISSIPPI

/s/Bethany B. Johnson

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### **CERTIFICATE OF SERVICE**

I, Bethany B. Johnson, Special Assistant Attorney General of the State of Mississippi, do hereby certify that I have caused to be mailed via U. S. Mail, postage prepaid, and emailed a true and correct copy of the above and foregoing document, to the following:

Sharon Paige  
226 Tudor Circle  
Brandon, MS 39042  
[Shatan09@yahoo.com](mailto:Shatan09@yahoo.com)

THIS the 13<sup>th</sup> day of June, 2023.

/s/ *Bethany B. Johnson*  
Bethany B. Johnson